

EXHIBIT D

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14 Attorneys for Defendants,
15 CITY OF ANAHEIM, JORGE CISNEROS,
16 PAUL DELGADO, BRETT HEITMAN,
17 KENNETH WEBER, and CATALIN PANOV

18 UNITED STATES DISTRICT COURT

19 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

20 ANTONIO LOPEZ, individually;
21 JOHANNA LOPEZ, individually;
22 M.R., by and through his guardian ad
23 litem, April Rodriguez, individually and
24 as successor in interest to Brandon
Lopez; B.L. and J.L., by and through
their guardian ad litem Rachel Perez,
individually and as successor in interest
to Brandon Lopez; S.L., by and through
his guardian ad litem, Rocio Flores,
individually and as successor in interest
to Brandon Lopez,

25 Plaintiffs,

26 vs.

27 CITY OF ANAHEIM; CITY OF
28 SANTA ANA; DAVID VALENTIN;
JORGE CISNEROS; PAUL
DELGADO; BRETT HEITMAN;
KENNETH WEBER; CAITLIN
PANOV; DOES 1-10,

Defendants.

Case No. 8:22-cv-1351

**DEFENDANT CITY OF
ANAHEIM'S SUPPLEMENTAL
DISCLOSURE PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 26(A)(1)**

Trial Date: Not Set

27 Defendant CITY OF ANAHEIM, JORGE CISNEROS; PAUL DELGADO;

28 134655531.2

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**DEFENDANT CITY OF ANAHEIM'S SUPPLEMENTAL DISCLOSURE PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 26(A)(1)**

1 BRETT HITMAN; KENNETH WEBER; and CAITLIN PANOV hereby provide
2 these **supplemental disclosures** as required pursuant to Federal Rule of Civil
3 Procedure 26(a)(1).

4 **POTENTIAL WITNESSES.**

5 Defendants are informed and believe that the following list represents the last
6 known names, addresses, and telephone numbers of individuals likely to have
7 discoverable information relevant to the disputed facts alleged with particularity in
8 the pleadings and identifying the subjects of the information, to the extent known to
9 defendants at present. Upon information and belief, there may be other witnesses
10 identified in the pending criminal investigation by the California Department of
11 Justice and, thus, such identities, if any, are not currently in possession of
12 Defendants and will be supplemented at time the investigation is complete.
13 Defendants reserve the right to amend and/or supplement these disclosures as
14 discovery is ongoing.

NO	NAME	ADDRESS	TELEPHONE	SUBJECT OF KNOWLEDGE
1.	Lopez, Antonio	Through Counsel	Through Counsel	π
2.	Lopez, Johanna	Through Counsel	Through Counsel	π
3.	Lopez, B.	Through Counsel	Through Counsel	Minor π
4.	Lopez, J.	Through Counsel	Through Counsel	Minor π
5.	Lopez, S.	Through Counsel	Through Counsel	Minor π
6.	Flores, Rocio	Through Counsel	Through Counsel	π
7.	Perez, Rachel	Through Counsel	Through Counsel	Guardian Ad Litem
8.	Rodriguez, April	Through Counsel	Through Counsel	π

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28 NOTE: All witnesses herein above and marked with an asterisk (*) are
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DEFENDANT CITY OF ANAHEIM'S SUPPLEMENTAL DISCLOSURE PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 26(A)(1)

1 believed to be currently employed by Defendant County of Riverside, and thus
2 should be contacted only through the defendant's counsel of record in this action.
3 See, Cal. R. Prof. Conduct 2-100.

4 **2. DOCUMENTS AND RECORDS.**

<u>NO</u>	<u>ITEMS 1-46 PREVIOUSLY DISCLOSED WITH DEFENDANTS' RRFP</u>
1.	APD Report, Stolen Vehicle-OIS, Compiled, 09/28/21 COA 000001-12
2.	OC Crime Lab, Vehicle Examination by OC Crime Lab Doretti, B., 01/14/22 COA 000013
3.	OC Crime Lab, Vehicle Examination by OC Crime Lab Ramirez, M., 11/24/21 COA 000014
4.	OC Coroner, Autopsy (1), Lopez, B. by Kim, Yong-son, 09/30/21 COA 000015-34
5.	OC Coroner, Autopsy Photographs by OC Crime Lab Flores, S., 09/30/21 COA 000035-52
6.	OC Crime Lab, Coroner re Lopez by Yong-son, K., 09/30/21 COA 000053
7.	OC Crime Lab, Embalming Photographs by OC Crime Lab Espenoza, S., 10/03/21 COA 000054
8.	OC Fire, EMS by OC Fire re OIS by Compton, M., 09/30/21 COA 000055-61
9.	OC Crime Lab, Evidence Collection at Autopsy by OC Crime Lab Zoccoli, J., 11/13/21 COA 000062
10.	OC Crime Lab, Scene of OIS by OC Crime Lab Leon, K., 09/28/21 COA 000063-64
11.	OC Crime Lab, Scene of OIS by OC Crime Lab Ramirez, M., 03/04/22 COA 000065-68

1	12.	OC Crime Lab, Scene of OIS by OC Crime Lab Walker, S., 02/16/22
2		COA 000069-72
3	13.	OC Crime Lab, Tox re Lopez by F.S. Havro, 12/01/21
4		COA 000073
5	14.	OC Crime Lab, Officer Processing by OC Crime Lab Peplowski, H., 10/18/21
6		COA 000074-75
7	15.	APD CAD Call Hardcopy re OIS Follow-Up Investigation, 09/28/21
8		COA 000076-144
9	16.	APD CAD Call Hardcopy re OIS, 09/28/21
10		COA 000145 -173
11	17.	Cell Phone, Collision with Bystander Vehicles, 09/28/21
12		COA 000174
13	18.	Critical Incident Community Briefing Video, 11/12/21
14		COA 000175
15	19.	OCSD Booking Photo of Lopez, 02/07/21
16		COA 000176
17	20.	OCSD Photos, Additional Scene, 09/29/21
18		COA 000177-293
19	21.	OCSD Photos, Analyst Casework
20		COA 000294-383
21	22.	OC Crime Lab Photos, Autopsy, 09/30/21
22		COA 000384-577
23	23.	OC Crime Lab Photos, CSI Crime Scene, 09/28/21
24		COA 000578-645
25	24.	OC Crime Lab Photos, Scene, 09/29/21
26		COA 000646-721
27	25.	APD, Policy Manual, 09/22/21
28		COA 000722-780
	26.	OC Chiefs' of Police & Sheriff's Association Protocol Policy, Governing Inter City SWAT Operations #110

1	COA 000781-784
2	27. APD Records, Training re Delgado, P., 12/32/21
3	COA 000785-793
4	28. APD Records, Training re Heitmann, B., 11/20/21
5	COA 000794-799
6	29. APD Records, Training re Panov, C., 12/31/21
7	COA 000800-806
8	30. APD Records, Training re Weber, K., 11/19/21
9	COA 000807-813
10	31. Driver's License, Lopez, B., 02/17/15
11	COA 000814
12	32. Docket, Criminal Case, Warrant, 02/09/21
13	COA 000815-822
14	33. Docket, Criminal Case, Warrant, 02/04/20
15	COA 000823-828
16	34. APD Report, Prior re Armed Robbery-Business, Compiled, 01/29/21
17	COA 000829-908
18	35. FDP Report, Prior re Assault-Battery, Compiled, 07/19/14
19	COA 000909-923
20	36. APD Report, Prior re Domestic Violence, Compiled, 02/01/20
21	COA 000924-953
22	37. APD Report, Prior re Robbery, Compiled, 01/14/21
23	COA 000954-967
24	38. FPD Report, Prior re Robbery-Handgun, Compiled, 01/21/21
25	COA 000968-991
26	39. APD Report, Prior re Robbery-Handgun, Compiled, 01/27/21
27	COA 000992-1010
28	40. APD Report, Prior re Robbery-Handgun, Compiled, 01/29/21
	COA 001011-1087
	41. APD Arrest Warrant, Prior Incident, Declaration by Inv. Celello, 02/09/21
	COA 001088

1	42.	APD OIS & In Custody Death Investigation Online Links
2		COA 001089 -1094
3	43.	APD UOF Memo re 10 Year Review of UOF Cases with Reprimands and Terminations by Lt. Starke, B., 12/07/2022
4		COA 001095-1196
5	44.	BWC re OIS by Delgado, 09/28/21
6		COA 001097
7	45.	BWC re OIS by Panov, C., 09/29/21
8		COA 001098
9	46.	BWC re OIS by Weber. 09/29/21
10		COA 001099
11	***	NEWLY DISCLOSED ITEMS START AT 47
12	47.	Video BWC from Officer Patrick Bradley; 09/28/2021
13		COA 001100
14	48.	Video BWC from Officer Lorenzo Uribe; 09/28/2021
15		COA 001101

In addition, Defendant identifies the following categories of documents that may exist relevant to this matter. Defendant reserves the right to amend and/or supplement these disclosures as discovery is ongoing.

1. All reports prepared by peace officers and public safety personnel who may have been involved with the incident alleged in the operative Complaint.
2. All reports prepared by law enforcement personnel and public safety personnel who may have investigated the incident alleged in the operative Complaint.
3. All medical records of any plaintiff, decedent, or individual involved in the underlying incident.
4. All pleadings filed in this matter.
5. All answers/responses to interrogatories, requests for production of documents, and requests for admission in this matter, including all amendments

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1 and/or supplements thereto, and including any and all documents attached thereto.

2 6. All transcripts and recordings of depositions and any document marked
3 as an exhibit to a deposition.

4 7. Reports of all parties' experts and all supporting documentation, date,
5 video presentations, learned treatises, publications, studies, etc.

6 8. Enlargements of graphs, photographs or other exhibits.

7 9. All exhibits identified through future discovery including any items
8 produced pursuant to a protective order in this matter.

9 10. Documents and materials identified in the Rule 26 disclosure
10 statements of the other parties in this case.

11 **3. COMPUTATION OF DAMAGES TO DISCLOSING PARTY.**

12 At present, the Rule 26 requirement to disclose the computation of any
13 category of damages claimed to the disclosing party does not apply to the
14 defendants.

15 **4. INSURANCE.**

16 Defendant County is insured up to a certain point per California Government
17 Code § 990.

18 **5. ONGOING DISCOVERY.**

19 Investigation and discovery by the defendants is continuing and is not yet
20 complete. Defendants reserve the right to refer to, conduct discovery with reference
21 to, or offer into evidence at trial any and all witnesses, facts, and evidence,
22 notwithstanding the absence of a reference to such witnesses, evidence, or facts
23 within these or any disclosures.

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1 All disclosures herein are to the best knowledge, information, and belief
2 formed after reasonable inquiry by defendants, and the defendants are informed and
3 believe that these disclosures are complete and correct as of the time made or
4 supplemented.

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6 DATED: January 17, 2024 LEWIS BRISBOIS BISGAARD & SMITH LLP
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9 By: Tori L.N. Bakken
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11 TONY M. SAIN
TORI L.N. BAKKEN
Attorneys for DEFENDANTS CITY OF
ANAHEIM, et al.
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FEDERAL COURT PROOF OF SERVICE
LOPEZ, ANTONIO, et al. v. CITY OF ANAHEIM, et al.
Case No. 8:22-cv-1351

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On January 17, 2024, I served the following document(s): DEFENDANT CITY OF ANAHEIM'S SUPPLEMENTAL DISCLOSURE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(A)(1)

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Dale K. Galipo, Esq.
Renee V. Masongsong, Esq.
LAW OFFICES OF DALE K. GALIPO
21800 Burbank Boulevard, Suite 310
Woodland Hills, CA 91367
Tel: (818) 347-3333
Fax: (818) 347-4118
dalekgalipo@yahoo.com
rvalentine@galipolaw.com

ATTORNEYS FOR PLAINTIFFS:
B.L., J.L., and M.R.

The documents were served by the following means:

- (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on January 17, 2024, at Los Angeles, California.

/s/ Curfew F. Wilson

Curfew F. Wilson